

From: [Jump, Christine](#)
To: [Mostafa Kamal](#); [Akhter Hossain](#)
Subject: emails to clean harbors
Date: Wednesday, April 01, 2015 3:13:00 PM
Attachments: [RE CH Wichita.msg](#)
[RE Clean Harbors update.msg](#)
[RE Building C - Confirmation sample results and map.msg](#)
[RE Wichita Drum discovery information.msg](#)
[RE Wichita Drum discovery information.msg](#)
[RE Wichita Drum discovery information.msg](#)
[RE Wichita update and GW monitoring Question.msg](#)
[Clean Harbors IRM activities.msg](#)
[RE Risk skeletal memo for CH Wichita..msg](#)
[Clean Harbors.msg](#)

After looking at these email exchanges, let me know if there are any topics that aren't clear. If so I probably forgot to include an email.

Thanks.

Jump, Christine

From: Jump, Christine
Sent: Friday, March 13, 2015 11:31 AM
To: Michael Stephenson; SMITH, MARTIN L
Subject: Clean Harbors IRM activities

Mike-

You indicated verbally on Wednesday the 11th that you will be sending a figure and sample results soon for ongoing activities associated with the sampling conducted to delineate the Building C excavation contamination south of the water line and the grid sampling required due to the stockpiling of excavated sediments. EPA looks forward to reviewing this information as soon as it is available.

EPA has encouraged open communication and sharing of data on this IRM project from the beginning in order to expedite decisions, and identify and avoid potential problems. The approved IRM work plan is for removal of impacted soils. The discovery of buried drums is not addressed in the work plan and is a significant enough variation that EPA should have been notified. At a minimum, EPA would have been made aware of this development sooner if confirmation samples had been submitted in accordance with the work plan, prior to back filling the excavation.

For ongoing IRM activities at the site, EPA should be notified by phone or email within 24 hours of any unanticipated findings, such as buried drums, buried drains or pipes, or elevated concentrations of contamination in areas not identified for excavation in the initial work plan.

The approved work plan also states that the IRM schedule will be updated periodically throughout the project and that "updated schedules will be forwarded to KDHE and EPA every 2 weeks for the duration of the project." While EPA did receive some verbal schedule updates earlier in the project, EPA has not consistently received updated schedules for site activities. EPA understands that field work often involves unexpected complications and delays. Currently, field activities are approximately 3 to 4 months beyond the original schedule projections.

In addition to the confirmation sampling information for the area south of Building C, please submit an updated schedule for the remaining IRM activities at the site. Also provide in writing the date the drums west of the Paint pit excavation were discovered, a map of the associated confirmation samples, the confirmation sample data, and the date the excavation was backfilled. Please submit this information by March 23, 2015. If you anticipate a problem submitting this information by the 23rd, please contact me so we can discuss an acceptable time frame.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
jump.chris@epa.gov

(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

Jump, Christine

From: Jump, Christine
Sent: Monday, January 12, 2015 12:28 PM
To: Michael Stephenson; SMITH, MARTIN L
Subject: Clean Harbors

Mike and Marty-

The IRM work plan states that final confirmatory sample results will be submitted to EPA prior to backfilling, where possible. EPA has not been receiving confirmation samples for the excavations, several of which are being backfilled. Please submit this data as required by the work plan.

I spoke with Todd Weaver on Friday. In response to a question regarding the timing of the excavation, he told me the excavation on the former Coastal refinery property will probably be immediately backfilled without waiting for results of sampling. This is different from the work plan and EPA should be notified of changes to the work plan if this is the plan.

Excavation of the "paint can pit" area is apparently limited to the south due to the petroleum pipeline. There has been discussion of delineating the extent of contamination associated with this SWMU either by "pot holing" on the south side of the pipeline, on the facility property or on the former refinery property, or by geoprobe samples at a future date. Please let me know which approach will be taken at the site.

The original schedule submitted for the IRM is no longer valid. Please submit a revised schedule for the remaining IRM activities.

Please clarify who is responsible for making decisions regarding implementation of the IRM at the site.

Please call me if you have any questions concerning this email.

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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

Jump, Christine

From: Jump, Christine
Sent: Monday, March 30, 2015 2:16 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Building C - Confirmation sample results and map

Mike-

Thank you for submitting the data. The purpose for reviewing the data prior to completion of the project was to make sure EPA and Clean Harbors concurred on the delineation. Since most of the site has been backfilled, it is not necessary to send me the data and maps from those areas unless you want EPA to look at the data for some reason prior to submittal of the final report.

Please let me know when you receive the last confirmation samples whether additional excavation will be necessary or whether the excavation phase is complete. I would like to see the data from the final grid sampling under the back fill piles when it is available.

Please call me if you have any questions.

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From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Monday, March 30, 2015 1:16 PM
To: Jump, Christine
Cc: SMITH, MARTIN L
Subject: Building C - Confirmation sample results and map

Hello Chris,

I will be sending you several things today of which the attached are the first. Attached please find a map and table for the Building C confirmation soil sample results. Please consider these draft as we are still working a few bugs out, but I know you expect to see these today so I want to get you started. I will transmit separate emails with maps and tables for the other areas as the day progresses.

Because there are so many sample locations to depict, we have created several zoomed in maps in hopes of making it easier to discern sample locations and IDs.

The data for the area south of the water line is not included in the tables, but was sent to you last week in a figure. We haven't yet processed that data through our database but it will appear in the IRM completion report of course.

Mike Stephenson
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Cameron-Cole LLC

50 Hegenberger Loop
Oakland CA 94621
office - (510) 777-1864
mobile - (510) 773-9895

Jump, Christine

From: Jump, Christine
Sent: Wednesday, February 04, 2015 3:42 PM
To: Michael Stephenson
Subject: RE: CH Wichita

Great.

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From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Wednesday, February 04, 2015 3:40 PM
To: Jump, Christine
Subject: RE: CH Wichita

Because we encountered groundwater at the bottom of the hole, only sidewall samples were collected and those results were all below IAOs.

From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
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I have a message into Bruce Fishman to see when he is available and I assume that getting on the phone to discuss before the end of February will not be a problem. I'll let you know some dates once I've spoken to Bruce.

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To: Michael Stephenson
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Do you have the confirmation sample results from the excavation on the Coastal Refinery property?

You are probably already doing this, but I want to make sure you realize that the stockpile areas must be sampled for both VOCs and metals.

I'm glad to hear that the NIC seminar was useful.

Have a good weekend.

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From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]

Sent: Friday, January 30, 2015 10:28 AM

To: Michael Stephenson

Subject: RE: CH Wichita

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From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]

Sent: Friday, January 30, 2015 11:05 AM

To: Jump, Christine

Cc: smith.martin@cleanharbors.com

Subject: RE: CH Wichita

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Please give me a call if you have any questions about this information. I hope that you are finding the RFI report to be enlightening.

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From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
Sent: Wednesday, January 28, 2015 7:28 AM
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Sent: Wednesday, January 28, 2015 7:28 AM
To: SMITH, MARTIN L; Michael Stephenson
Subject: CH Wichita

I haven't received an update for a while. Is everything backfilled and sampled at the Clean Harbors site in Wichita?

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
jump.chris@epa.gov
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

Jump, Christine

From: Jump, Christine
Sent: Friday, January 30, 2015 2:22 PM
To: Michael Stephenson
Subject: RE: CH Wichita

Mike-

I am trying to reconcile the descriptions in your email with the map. Are the yellow highlighted areas on the map current as of today?

In the process area, the email indicated a sample on the southeastern side of the process area failed for lead; however, the map shows an area along the south wall of a western extension from the Process area. Is the yellow highlighted area on the map the area that exceeded for lead? Is this western extension the area where the drums were located?

According to the map, it appears that the building C excavation south of the waterline needs to be extended in all directions, not just along the eastern edge. Is this accurate?

The map suggests the entire paint pit area needs additional excavation. I understand excavation to the south is prohibited by the petroleum pipeline, but what about the area to the west? Your email indicated the excavation would be extended to the north and east.

Do you have the confirmation sample results from the excavation on the Coastal Refinery property?

You are probably already doing this, but I want to make sure you realize that the stockpile areas must be sampled for both VOCs and metals.

I'm glad to hear that the NIC seminar was useful.

Have a good weekend.

Thanks.

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From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Friday, January 30, 2015 12:31 PM

To: Jump, Christine
Subject: RE: CH Wichita

Hi Chris,

Timing is everything, I just received this figure depicting the limited areas where we continue to dig. The lead exceedance was at 2.5 feet. No other samples in the area had results exceeding the IAO for lead.

Mike

From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
Sent: Friday, January 30, 2015 10:28 AM
To: Michael Stephenson
Subject: RE: CH Wichita

Can you modify an existing figure to show me where excavation is ongoing/being extended?

What depth was the lead exceedance in the process area at? Were there lead exceedances in other samples or areas?

Thanks.

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From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Friday, January 30, 2015 11:05 AM
To: Jump, Christine
Cc: smith.martin@cleanharbors.com
Subject: RE: CH Wichita

Hi Chris,

A quick note to update you on the activities at Wichita. There remain a few isolated areas where we continue to excavate in pursuit of soil results beneath IAOs. The remaining areas are as follows.

Paint Pit – The excavation is being extended further to the north and east chasing stained soil present at 13-15 feet bgs. Further extension of this hole to the south is not possible due to the gas line. This activity will continue next week.

Process Area – There was one sample on the southeastern side of the process area which failed for lead, additional excavation will be performed to retrieve this material.

Building C – There are two samples that continue to show exceedances. One of these is in the central portion of the excavation where one sidewall sample collected between the yellow and green areas of the blob map slightly exceeds

IAOs. The second area is in the eastern test pit that was installed south of the water line where sidewall concentration on the eastern edge exceed IAOs. Additional excavation in this area is also being performed.

Resolution of the NE corner excavation is also yet to be performed and we hope to get to that next week.

We are beginning to excavate the top 6-inches of material present beneath excavation stockpiles and collecting samples to verify that excavated material did not impact underlying soils. These samples are being collected at a frequency of 1 for every 2500 square feet, consistent with the excavation floor sampling frequency.

The buried drum area has been excavated to the point where no stained or discolored soil was present and all confirmation samples were below IAOs.

I got some good information at the NIC seminar last week pertaining to groundwater sampling as a part of the MNA alternative for OU-1. There are some implications of the NIC program that will play a role in our well re-installation locations and design that we can speak about. Essentially, the NIC would like us to re-install three well pairs at locations and with construction as close to the previous wells as possible. Data from these three well pairs (SK-2S/D, SK-1S/d and SK-4S/D) is being used by the NIC to evaluate long term VOC trends in its evaluation of MNA as a remedy.

Please give me a call if you have any questions about this information. I hope that you are finding the RFI report to be enlightening.

Thanks,

Mike Stephenson
Principal Scientist
Cameron-Cole LLC
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Oakland CA 94621
office - (510) 777-1864
mobile - (510) 773-9895

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Jump, Christine

From: Jump, Christine
Sent: Tuesday, January 06, 2015 11:41 AM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Clean Harbors update?

Mike-

Thanks for the phone update. I received this email after our call, so I don't know if that means your computer systems are back up and running, or not (hopefully so).

I know you indicated Clean Harbors was meeting with Coastal today or tomorrow about access issues. I would like to know when that excavation work will start, and what the current time estimate for completing that work is (I realize that may change based on what the excavation shows). I am potentially interested in being on site when the offsite excavation is occurring.

Thanks.

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Waste Remediation and Permitting Branch
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(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Tuesday, January 06, 2015 10:46 AM
To: Jump, Christine
Subject: RE: Clean Harbors update?

Hi Chris,

I'll need to speak with Marty and the field guys before giving you an update. I've been out of the office somewhat with the holidays and some illness that has been running through my household. I'll get you an update just as soon as I can get more information.

Thanks,

Mike

From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Monday, January 05, 2015 9:09 AM
To: SMITH, MARTIN L; Michael Stephenson
Subject: Clean Harbors update?

Hi Marty and Mike-

I hope you had a good new year holiday.

I just wanted to check in and get a status report on activities at Clean Harbors in Wichita. When I left the site on Tuesday 12/30/14 they had removed 3 drums from the west wall of the process area excavation and had to delay additional excavation of the debris and stained soil in that area due to concerns about the truck access route between the bldg. C excavation and the process area excavation. I attached a photo of the drum that triggered this additional work.

The former paint can pit excavation had strong odors (even at 14 degrees F) and showed staining that would require further excavation in all directions; however, continued excavation to the south was significantly restricted due to the petroleum pipeline. There was discussion as to whether the additional delineation of that area would be done by pot hole excavation (potentially on the refinery property) or future geoprobe samples. Todd told me they still did not have access for excavation on the former refinery property and potentially anticipated up to 8 more days of excavation.

Can you give me an update as to what has been accomplished to date, what remains to be done, and a projected schedule? Thanks.

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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

Jump, Christine

From: Jump, Christine
Sent: Monday, March 09, 2015 10:56 AM
To: Michael Stephenson; SMITH, MARTIN L
Subject: RE: Risk "skeletal" memo for CH Wichita.

Please provide me with an update and schedule of ongoing activities at the Clean Harbors Wichita Site.

According to the approved IRM workplan, draft confirmation sample locations and results are supposed to be submitted to EPA for review and approval prior to restoration. EPA has not received the majority of this information. Also, EPA has not received any information regarding the exceedances associated with soil stockpile grid sampling described in the email below.

Please provide the confirmation sampling data for any areas not already restored and information and data associated with the stockpile confirmation sampling and any areas where additional excavation will be necessary.

Thank you.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
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jump.chris@epa.gov
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Thursday, March 05, 2015 12:38 PM
To: Jump, Christine
Subject: RE: Risk "skeletal" memo for CH Wichita.

Hi Chris,

I believe the paint pit excavation has been completed and we are in the process of conducting the grid sampling for areas where soil was stockpiled. Having some exceedances south of Building C, just south of the water line that appear to be a southerly extension of the Building C blob and not related to contaminated soils management since impacts are present at depth. We are working on defining the extent of IAO exceedance in this area prior to digging it out. I should have some solid answers by next week.

Mike

From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Thursday, March 05, 2015 9:23 AM
To: Michael Stephenson
Subject: RE: Risk "skeletal" memo for CH Wichita.

Thanks. I'll forward it on to Ann.

What is the status of the excavation/backfilling at the Wichita Facility?

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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Thursday, March 05, 2015 10:58 AM
To: Jump, Christine
Subject: Risk "skeletal" memo for CH Wichita.

Hi Chris,

I've attached the memo we discussed in our call last week. I'm sending as a word document so you and Ann can redline it with any additions you'd like to see in the memo. Per my notes, I think this covers everything. Let me know if you have any questions.

Thanks,

Mike Stephenson
Principal Scientist
Cameron-Cole LLC
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Oakland CA 94621
office - (510) 777-1864
mobile - (510) 773-9895

Jump, Christine

From: Jump, Christine
Sent: Thursday, March 26, 2015 3:43 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Wichita Drum discovery information

Great. thanks.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
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(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Thursday, March 26, 2015 3:17 PM
To: Jump, Christine
Subject: RE: Wichita Drum discovery information

No. The information I am pulling together consists of the confirmation data and sample location maps for the western portion of the property. You have already received everything from the eastern portion. The maps are the holdup but I'll transmit once I have everything together.

However, we did analyze the white soft material for PCBs and none were detected. Detection limits ranged from 224 (all congeners except Aroclor 1221) and 448 (Aroclor 1221) ug/kg.

Mike

From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
Sent: Thursday, March 26, 2015 1:11 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Wichita Drum discovery information

Thanks for the update.

When you said you are pulling together the other information I requested, did you mean the PCB data?

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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Thursday, March 26, 2015 2:50 PM
To: Jump, Christine
Cc: SMITH, MARTIN L
Subject: RE: Wichita Drum discovery information

Hi Chris,

I thought I was going to have to transmit to you through the box website but after I pdf'd the document it was small enough to email. We may use the box again in the future, but I'll setup a different invite for that. Long story short, you don't need to accept the invite.

I'm busily pulling together the other information you requested.

The excavation of the area south of Building C was completed late last week. Initial sampling results indicated a total of four confirmation samples had concentrations of PCE exceeding the IAO. Two of these were located adjacent to the water line and could not be further excavated. The other two were from sidewall samples collected from the 15' excavation (south and east walls at 12.5 ft bgs.) The concentrations in these two samples were around 200 ppb for PCE. Additional excavation of these sidewalls has been performed and we are awaiting the follow on confirmation results.

Also last week the drums and contents were moved from the plastic sheeting into a roll off box for disposal at Kimball.

Stockpiled soil is being trucked off site for disposal at Lone Mt. This activity will continue through the week and possibly into next week.

Thanks,

Mike Stephenson
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Mike

From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
Sent: Thursday, March 26, 2015 12:40 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Wichita Drum discovery information

I received an invitation from Cameron-Cole to collaborate on a box. Does that invite contain the same information as this email or do I still need to accept the invite?

Also, were there any PCBs detected in the soft white material?

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From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Thursday, March 26, 2015 1:47 PM
To: Jump, Christine
Cc: SMITH, MARTIN L
Subject: Wichita Drum discovery information

Hello Chris,

Attached please find two documents. One provides photos and a narrative describing the drum discoveries at the CH Wichita facility and the other provides the analytical data for detected compounds from drum sampling conducted in your presence on March 11, 2015. Please call me if you have any questions about this.

Thanks,

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Jump, Christine

From: Jump, Christine
Sent: Monday, March 23, 2015 10:43 AM
To: Michael Stephenson
Cc: SMITH, MARTIN L
Subject: RE: Wichita update and GW monitoring Question

Hi Mike-

With respect to your request to delay the April ground water monitoring event, EPA approves postponing this event until the NIC site-wide sampling event or when the new site wells are installed, whichever is sooner.

With regards to the proposed extent of excavation, the 15' depth excavation does not appear to be delineated in all directions by samples collected adjacent to those that failed. There is no scale on the figure to evaluate potential confirmation sample locations; however, based on the depicted tetrachloroethene (PCE) distribution, confirmation samples for the 15' excavation should, at a minimum, be collected at 10' and 15' on the west wall of the excavation, the east wall of the excavation, the southwest wall of the excavation, and the southeast wall of the excavation.

Also, please confirm that there are no other constituents that exceed the groundwater protection standards in this area or, if there are, please confirm that the exceedances occur at the same intervals as the PCE exceedances.

When will you receive the analytical results from the drum contents? I would like to see those results when you receive them to make sure that the analytical suite for confirmation samples is sufficient.

Please call me if you have any questions.

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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Thursday, March 19, 2015 11:23 AM
To: Jump, Christine
Cc: SMITH, MARTIN L
Subject: Wichita update and GW monitoring Question

Hello Chris,

Attached please find the map of the additional area south of Building C that we are excavating. The map shows the excavation extents, depths and posts analytical results obtained during our sampling efforts to delineate the impacts in this area. I believe we have it pretty well defined, and we will perform confirmation sampling of this dig area in accordance with the frequencies specified in the work plan. If you have any concerns regarding this, please call or email.

On another topic, you'll recall that we agreed to not perform the October 2014 groundwater sampling event at the Site due to the ongoing excavation activities and because we had abandoned many of our wells in anticipation of the excavation. We had anticipated at the time that we would have our MW network re-established by now with any

changes incorporated based upon RFI and confirmation sampling results. Considering we are still digging and do not have these wells re-installed nor have we all (EPA, Clean Harbors) had a chance to discuss what the MW network should look like post IRM, I propose that we forgo the groundwater sampling event that would normally occur in April 2015 until we have a chance to get these other things done. We would like to, at a minimum, have the wells that will be monitored as a part of the NIC MNA study re-installed prior to the NIC sampling event this June or July, but see limited value in sampling a small subset of the wells this April. Ideally we would re-install these replacement wells, and any others that arise out of our discussions, in one mobilization sometime in April or May of this year.

That said, we need to get the field crew scheduled very soon if you'd like the small number of wells that remain on site sampled this April. I appreciate you getting back to me on this as soon as you can.

Thanks,

Mike Stephenson
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